

ORIGINAL

UNITED STATES DISTRICT COURT

FOR THE

NORTHERN ~~TEXAS~~ DISTRICT OF TEXAS

DALLAS ~~TEXAS~~ DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

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DEPUTY CLERK 

MICHEAL GEROD MCGREGOR,
(MICHAEL GERARD MCGREGOR)
plaintiff,

v.

COUNTY OF DALLAS
respondent,

8-15CV-2975B
CIVIL ACTION NO. _____

COMPLAINT FOR COPYRIGHT INFRINGEMENT AND UNFAIR COMPETITION.

STATEMENT OF JURISDICTION.

(1). The plaintiff is a citizen of Texas, a corporation incorporated under the laws of the State of Texas with it's principal place of business in Texas. The defendant, DALLAS COUNTY, a corporation incorporated under the laws of the State of Texas with it's principal place of business in the State of Texas. The amount in controversy, without interest and costs, exceeds the the sum of or the value specified by 28 U.S.C., §1332.

(2). Before June 3, 1997, the plaintiff, a United States citizen, registered the name, MICHAEL GERARD MCGREGOR, Inc., as a sole-proprietor corporation.

(3). The name, MICHAEL GERARD MCGREGOR, is an original work, that may be copyrighted under the United States law.

(4). Between January 1994 and January 1995, the plaintiff applied to copyright office and received a certificate of registration, date unknown, and identified as that corporation.

(5). Since January 1995, the plaintiff has either published or licensed for publication all copies of the name in compliance with the copyright laws and has remained the sole owner of that copyright.

(6). After the copyright was issued, the defendant infringed on the copyright by publishing the name entitled; MICHAEL GERARD MCGREGOR, which was copied largely from the plaintiff.

(7). The plaintiff has notified the defendant in writing of the infringement.

(8). The defendant continues to infringe on the copyright by continuing to publish the name in violation of the copyright, and further has engaged in unfair trade practices and unfair competition in connection with it's publication, thus causing irreparable damage.

THEREFORE, the plaintiff demands that:

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COMPLAINT FOR COPYRIGHT INFRINGEMENT AND UNFAIR COMPETITION CONT'D.

(a). Until this case is decided, the defendant and the defendant's agents be enjoined from disposing of any copies of the defendant's publications of the name or it's use.

(b). The defendant account and pay as damages to the plaintiff all profits and advantages gained from unfair trade practices and unfair competition in using plaintiff's name, and all profits and advantages gained from infringement of the plaintiff's copyright, (no less than the statutory minimum).

(c). That the defendant deliver for impoundment all copies of the name in the defendant's possession or control and deliver for destruction, all infringing copies and all likenesses, molds, and other material for making infringing copies. Stop using the name MICHAEL GERARD MCGREGOR for any purpose without compensation.

(d). That the defendant pay the plaintiff interest, costs and reasonable attorneys' fees and;

(e). That the plaintiff be awarded any and all other just relief, so entitled.

Dated and Signed 9/3/2015.

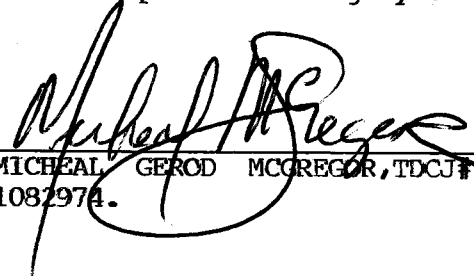
Sincerely and Respectfully Submitted,


MICHAEL GEROD MCGREGOR, TDCJ# 1082974

CERTIFICATE.

I, MICHAEL GEROD MCGREGOR, TDCJ# 1082974, declare under penalty of perjury that the foregoing is true and correct and that this COMPLAINT FOR COPYRIGHT INFRINGEMENT AND UNFAIR COMPETITION was placed in the prison mailing system on September 3, 2015.

Executed and Signed on September 3, 2015.


MICHAEL GEROD MCGREGOR, TDCJ# 1082974.

TERESA L. GREGG MCGREGOR

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Gatesville, Texas 76597

AUSTIN TX TX
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09 SEP 2015 PM 11



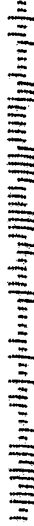
UNITED STATES DISTRICT COURT

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